

OPEA comments to discuss with Brett:

14. Lead and leaching/TCLP, filtering of samples; the filtering topic was discussed several times. Brett doesn't remember if it got resolved about whether it was a hot spot. For risk, use the unfiltered data; for leaching, use the filtered.

15. Landfill gas investigation; it's a problem. They will have to take a minimum number of samples. They shouldn't base taking landfill gas samples on what they see in the soil. How to address future potential risk. If we assume any new construction has to have vapor mitigation/barrier, then you can collect fewer vapor samples. We want to contain off-site migration and prevent risk to existing structures. In the CH2M RI/FS they had continuous monitoring for methane and also vapor removal system in addition to what is already installed.

19. NAPL screening tool? You could hook up special LIF, TarGOST. They say they won't take soil sample unless they see response or visual sample; Brett made comment why not submit soil analysis;

21 & 22. Datagaps; Brett would like to hear the rationale for conducting additional characterization in the middle of the landfill if there's no real indication that it is threat to direct contact or going offsite in groundwater.

43. soil leaching values; Brett wants clarification, the floodplain is not a source.

45. visls; Hill made the same comment. PRP's jump in logic is not appropriate. If they collect a soil sample, they can't use soil concentration as a way to determine if soil gas sample will be taken.

50. groundwater delineation; clarify that there are not EU's with respect to GW

55. related to background; Keith F's only comment on risk assessment is that the background study should be in the FS, not the RI/risk assessment. You collect all your samples, then you do your background statistics at the end so it doesn't drive decisions. Brett recommends don't include all these comments on background; we state to the PRPs our position that they can't compare fill to background. Brett will doublecheck on non-fill comparisons.

68, 70 & 71. Gas probe installed close to source; keep in.

77. are these needed/desirable?; keep in.